

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Tamille Williams,

Plaintiffs,

v.

**Chengliang Huang and East West
Wholesale, Inc.,**

Defendants.

Case No.: 6:24-cv-04957-DCC

**CONSENT MOTION TO AMEND
SCHEDULING ORDER**

TO: UNITED STATES DISTRICT COURT:

The parties respectfully request that certain deadlines in Amended Conference and Scheduling Order (Dkt. No. 22), beginning with the Plaintiffs' expert disclosure deadline, be extended by sixty (60) days. This Motion is made pursuant to Rules 6 and 16, FRCP. A chart containing the information required by Local Rule 6.01 is included. Pursuant to Local Rule 6.01, a proposed Second Amended Conference and Scheduling Order is submitted herewith. Pursuant to Local Rule 7.04, a separate memorandum including the information required by Local Rule 7.05 is not attached, as that information is contained below.

BACKGROUND

This is a personal injury action involving a motor vehicle crash that happened on June 25, 2024, on Orchard Park Dr. in Greenville, South Carolina. *See* Complaint, Dkt. 1, ¶¶ 9-11. Defendant Chengliang Huang, driving a box truck in the course and scope of his employment or agency with Defendant East West Wholesale, Inc., allegedly reversed into the front of a vehicle driven by Plaintiff Tamille Williams. *Id.* at ¶¶ 31-34. Plaintiff alleges she sustained permanent

injuries and damages as a result of the crash. *Id.* Defendants deny Plaintiff sustained injuries and damages, and asserts various affirmative defenses. *See generally* Answer, Dkt. 9.

FACTS BEARING UPON MOTION

The parties have been active in discovery so far, completing written discovery and scheduling depositions of the parties. Additionally, Plaintiff has continued to receive medical treatment for her injuries, delaying her deposition. Thus, the parties have been diligent in the development of the case

ARGUMENT

Pursuant to Rule 16(b)(4), “[a] schedule may be modified only for good cause and with the judge’s consent. Rule 16(b)(4), FRCP; *see also* Rule 6, FRCP. Such good cause exists in this case. As noted above, the parties have conducted written discovery and scheduled depositions for the fact witnesses, but significant additional time will be needed for medical witness depositions and expert discovery. Plaintiff is still treating, and the treatments (and recommendations) that have been rendered to date will require review by experts from both sides. More time to investigate these issues will benefit all parties, as the case moves towards either trial or negotiated resolution.

LOCAL RULE 6.01 INFORMATION

<u>Item</u>	<u>Deadline Under Amended Conference and Scheduling Order</u> (filed March 17, 2025) (Dkt. No. 22) ¹	<u>Deadline Under Proposed Second Amended Conference and Scheduling Order</u>
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¹ The Court’s Original Conference and Scheduling Order (Dkt. No. 12) was issued on December 9, 2024 and was amended in the ordinary course subsequent to the parties’ Rule 26(f) conference.

Plaintiff's Expert Disclosures	July 19, 2025	September 17, 2025
Defendants' Expert Disclosures	August 18, 2025	October 17, 2025
Records Custodian Affidavits	September 30, 2025	November 29, 2025
Completion of Discovery	October 9, 2025	December 8, 2025
Motions (Excluding those regarding evidence admissibility and those to compel discovery)	October 23, 2025	December 22, 2025
Mediation	November 7, 2025	January 6, 2025
Pre-Trial Disclosures	December 15, 2025	February 13, 2026
Motions in Limine	December 6, 2025	February 4, 2026
Trial	On or after January 5, 2026	On or after March 6, 2026

CONCLUSION

For the foregoing reasons, the parties respectfully request that the proposed Second Amended Scheduling Order be adopted in this case.

Signature Page to Follow

I SO MOVE:

s/Jake M. Tillery

Mark S. Barrow, Fed. I.D.

Marshall C. Crane, Fed. I.D.

Jake M. Tillery, Fed. I.D.

Sweeny, Wingate & Barrow, P.A.

Post Office Box 12129

Columbia, SC 29211

(803) 256-2233

Attorneys for Defendants

I CONSENT:

s/Cooper Klaasmeyer

Cooper Klaasmeyer

Fed. I.D. 14272

Morgan and Morgan

4401 Belle Oaks Drive

North Charleston, SC 29405

(843) 973-5438

Attorney for Tamille Williams